

January 10, 2025

By ECF

Hon. Lashann Dearcy Hall
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Walden v. Peter S. Kosinski, et al.*, 25-cv-00072 (EDNY)(LDH)(TAM)

Dear Judge DeArcy Hall:

I represent the Plaintiff in this recently filed action, which alleges violations of Plaintiff's free speech and association and equal protection rights in connection with his candidacy for Mayor of New York City. The Defendants have been served with the summons and complaint. The Office of the New York Attorney General represents the individual defendants, all of whom are sued only in their official capacities as officials of the State Board of Elections (collectively, the "State Board Defendants").

Plaintiff intends to move for a preliminary injunction. Counsel for the State Board Defendants and I have reached agreement on a proposed briefing schedule, and for filing their response to the Complaint. Counsel for the New York City Board of Elections (the "City Board") has advised me that his client does not take a position on this scheduling application. I therefore write on behalf of Plaintiff and the State Board Defendants to request the following schedule, subject of course to Your Honor's convenience:

Plaintiff's motion papers served by email by January 15;

Defendants' opposition papers served by email by January 31;

Plaintiffs' reply papers served by email (and all papers filed by ECF) by February 7.

State Board Defendants to file answer or otherwise respond to the Complaint on or before ten (10) days after the Court decides the motion for a preliminary injunction.

Plaintiff and the State Board Defendants request that the Court order this schedule despite that the City Board has not taken a position given the exigencies of the electoral calendar.

Respectfully submitted,



John R. Cuti

cc: counsel for all Defendants (by email)